

Scott D. Musoff  
Timothy G. Nelson  
Elizabeth A. Hellmann  
Shannon T. Lazzarini  
SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP  
Four Times Square  
New York, New York 10036-6522  
Phone: (212) 735-3000  
Fax: (212) 735-2000  
Email: Scott.Musoff@skadden.com  
Timothy.G.Nelson@skadden.com

*Counsel for Castle Harlan, Inc.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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NORCAST S.A.R.L.,	:
	:
Plaintiff,	: Civ. A. No.: 12 Civ 4973 (PAC)
	:
- against -	: <b>ECF CASE</b>
	: <b>Electronically filed</b>
CASTLE HARLAN, INC.	:
	:
Defendant.	:
-----X	

**DECLARATION OF TIMOTHY G. NELSON**

Pursuant to 28 U.S.C. § 1746, Timothy G. Nelson declares, under penalty of perjury, as follows:

1. I am a member of the bar of this Court and of the law firm of Skadden, Arps, Slate, Meagher & Flom LLP, counsel for defendant Castle Harlan, Inc. ("Castle Harlan").

2. I respectfully submit this declaration in support of Castle Harlan's Motion to Dismiss and/or Stay All Claims in Favor of International Arbitration; and to place before the Court true and correct copies of the following documents:

<u>Exhibit</u>	<u>Document</u>
A	Confidentiality Agreement, dated March 15, 2011, between Castle Harlan, Inc. and Norcast Wear Solutions, Inc.
B	Exclusivity Letter, dated June 1, 2011, between Pala Investments Holdings Limited, Castle Harlan, Inc., Norcast Wear Solutions, Inc. and Norcast S.à.r.l.
C	Andy Hoffman and Paul Waldie, <i>The curious case of the reclusive, resource-hungry Russian</i> , GLOBE & MAIL (June 5, 2009), available at 2009 WLNR 10782315
D	Share Purchase Agreement, dated June 17, 2011, between Norcast S.à.r.l. and 0913034 B.C. Ltd.
E	Letter, dated July 20, 2011, from Australian counsel to Norcast (Allens) to Australian counsel to Bradken (Mallesons), advising of contemplated lawsuit against Bradken in connection with Bradken's July 11, 2011 indirect acquisition of NWS
F	Order of the Honorable Paul A. Crotty, dated November 17, 2011, quashing deposition subpoenas issued by Norcast pursuant to 28 U.S.C. § 1782, and allowing with certain limitations document production subpoena directed at Castle Harlan
G	Stipulated Confidentiality and Protective Order, entered January 19, 2012, between Castle Harlan, Inc. and Norcast S.à.r.l. in <i>Application of Norcast S.à.r.l.</i> , Case No. 11 Misc. 00251.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 18, 2012  
New York, New York



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Timothy G. Nelson